

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

PAUL HARVEY,	*
	*
Plaintiff,	*
	* C. A. No. 04-1393 (KAJ)
v.	*
	* TRIAL BY JURY DEMANDED
DOLLAR TREE STORES, INC.,	*
a Virginia corporation,	*
	*
Defendant.	*

**PLAINTIFF'S INITIAL DISCLOSURES MADE PURSUANT TO**  
**FED. R. CIV. P. 26(a)(1)**

Plaintiff Paul Harvey, by and through his attorneys, Schmittinger and Rodriguez, P.A., hereby discloses the information required by Fed. R. Civ. P. 26(a)(1) to Defendant as follows:

A. The following individuals are likely to have discoverable information that Plaintiff may use to support his claims (but not solely for impeachment):

1. Plaintiff;
2. Mary Poole, Store #53 Manager for Defendant corporation;
3. Barbara Boley, Assistant Store #53 Manager for Defendant corporation;
4. David Crawford, District Manager for Defendant corporation;

B. See Plaintiff's Response to Defendant's Request for Production for copies of all documents, data compilations, and

tangible things in the possession, custody, or control of Plaintiff that Plaintiff may use to support his claims (but not solely for impeachment), other than information related to Plaintiff's damages.

C. The categories of damages claimed by Plaintiff are as set forth in Plaintiff's Complaint. These damages are not subject to quantification at this point. Evidence regarding damages will be provided in discovery as requested by Defendant.

D. Plaintiff has no obligation for disclosure pursuant to Fed. R. Civ. P. 16(a)(1)(D).

SCHMITTINGER & RODRIGUEZ, P.A.

BY: 

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Dated: 3-31-05  
WDF:tcl